

RECEIVED
FEDERAL ELECTION
COMMISSION

BENJAMIN ORR WHITE

Pearl City, Hawaii 96782
Ph: (
Email:

2014 JUN 18 PM 12:10

OFFICE OF GENERAL
COUNSEL

Ms. Ruth Heilizer
Attorney, Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR # 6843

June 12, 2014

Dear Ms. Heilizer,

Thank you for your letter and taking the time to speak with me the other day. The purpose of this letter is to re-file the complaint against Congressional Candidate, Mark Takai. The complaint has been revised to meet the necessary standards required to submit a valid complaint.

The facts of this complaint are centered on the illegal solicitation of a federal employee which may or may not fall within FEC jurisdiction. But the periphery action of a couple solicitation through email without a disclaimer does fall within the preview of the FEC according to the FEC's "Special Notices on Political Ads and Solicitations." The FEC brochure specifies a required disclaimer on all emails which solicit political campaign contributions. There are two offenses where Mark Takai sent an email with no disclaimer, please refer to Items "A" and "C".

In addition to the email violations, the telephone call from Mark Takai while I was in Korea was a telephone violation because Mark Takai did not disclose the necessary statements required for a telephonic political campaign solicitation. The FEC brochure specifies on page 9

BENJAMIN ORR WHITE

Pearl City, Hawaii 96782

FEC – Complaint against Mark Takai

that a telephone solicitation must meet three requirements, and none of these requirements were met.

Further, this complaint in accordance with 2 U.S.C. § 437g(a)(1) has been sworn to and signed in the presence of a notary republic and shall be notarized. (see below) The complaint is being submitted in writing. This complaint has my full name and address which is in the header. The entity identified who is alleged of violating statutes under FEC jurisdiction is Mark Takai as the respondent. As previously stated the violations the violations of this formal complaint is based on 11 C.F.R § et al. And the facts of this formal complaint have clearly been laid out to illustrate the FEC jurisdiction and statute violation(s) with supporting documentation from the original complaint that was submitted in the complaint on May 27, 2014. All of the facts and information and alleged violations from the May 27, 2014 complaint are submitted herein ALL as part of this re-filed complaint for consideration with this formal complaint submitted and dated, June 12, 2014. The respondent's address is:

**Mark Takai for Congress
Mark Takai
CD-1 Candidate
PO Box 2267
Pearl City, HI 96782**

I am optimistic that your consideration of the complaint and related facts will facilitate the ability for the FEC to take the appropriate corrective actions. Thank you for your consideration and I look forward to hearing from you.

BENJAMIN ORR WHITE

Pearl City, Hawaii 96782

FEC = Complaint against Mark Takai

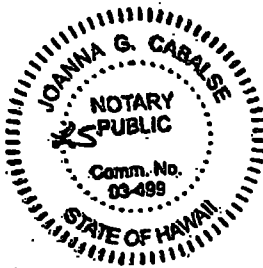
Respectfully Submitted,

Benjamin O. White

BENJAMIN O. WHITE
"Citizen Soldier"

NOTARY:

Subscribed and sworn to before me on this 12th day of June,
2014.



Doc. Description: Attorney Complaints
Examination of Legal Administration
Doc. Date: 6/12/2014 No. Pages: 3
Joanna G. Cabalse Notary Printed Name
Joanna G. Cabalse Notary Signature

Issues:

1. **Political Campaign Solicitation of Junior Officer** – LTC Mark Takai is both a Hawaii Army National Guard Officer and politician (State of Hawaii Representative) who is currently running a political campaign for the seat representing Hawaii's 1st Congressional district. The Department of Defense has very strict guidelines regarding the political participation of uniformed service members and federal civilians. These guidelines are listed in the reference section below. Nevertheless, when a LTC/O5 is a Congressional Candidate and solicits an "on duty" reserve subordinate (by rank) for a sizeable campaign contribution, there is cause for alarm and concern.
 - a. **Supporting Fact #1** – LTC Mark Takai filed his "nomination paper" to seek Congressional Office with the State of Hawaii Office of Elections on February 5, 2014. (Current Candidate Filing Report, May 19, 2014)
 - b. **Supporting Fact #2** – O/a March 25, 2014 at approximately 1500 HST, CPT Ben White receives a phone call on his cell phone from an unrecognized 808 phone number. CPT White answers, and did not recognize the voice. The voice says, "Ben this is Mark, Mark Takai." CPT White then asks if he could call LTC Takai back in a month because he explained that he was "on duty" in South Korea as an Individual Mobilization Augmentee (IMA) with the USFK J4, and did not want to run up a big international cell bill. LTC Takai said that he just needed a minute. LTC Takai asked how is "my old bunk mate" from Kuwait, and then explained that he was running for Congress and that he needed a favor and asked CPT White to donate five hundred dollars to his campaign for congress. CPT White explained that he had to talk to his spouse because money was tight with having to pay private school tuition for two boys. LTC Takai replied, "You can afford it making all that good GS money as 'civilian' (federal)" CPT White, felt extremely uncomfortable and changed the subject to congratulate LTC Takai on his promotion and ask what he thought of ILE, before ending the call.
 - c. **Supporting Fact #3** – CPT White then received an email to his Gmail account from LTC Takai the same day (March 25, 2014 at 1629) which summarized their phone call and provided a link to his campaign website and the way to make a contribution. (see attached item "A") CPT White received this email while he was in an on duty status.
 - d. **Supporting Fact #4** – CPT White feeling extremely uncomfortable regarding the phone call (solicitation) and email reached out to his father, a retired Army Reserve Colonel to ask how he should handle the situation. COL (R) White advised CPT White to ignore future phone calls because "he shouldn't be calling soldiers." (see attached item "B")
 - e. **Supporting Fact #5** – On Friday, March 28, 2014, CPT White receives another email from LTC Takai requesting CPT White give him a minute to call him at because he had a fundraising deadline (for his campaign) of March 31, 2014 and LTC Takai wanted CPT White to help him out with something (campaign contribution). (see attached item "C") This email is another instance of LTC Takai's repeated solicitation of a junior officer for money to his political campaign while CPT White was still an on duty reservist.

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- f. **Supporting Fact #6 – Both the Joint Ethics Regulations (JER), DOD Directive 5500.07 (November 17, 2009), and Code of Federal Regulations (CFR) Title 5, Part 734 specify that solicitation by federal employee (LTC Takai) to another federal employee (CPT White) for political contributions is prohibited. (CFR 5:§734.303) LTC Takai violated these laws on a least two occasions. Additional offenses could be tied to 2 U.S.C. § 441a, 10 U.S.C. § 973, DOD Directive 1344.10, Army AR 600-200, and 18 U.S.C. Chapter 29. LTC Takai's violation of these laws is also considered a violation of Article 92 of the UCMJ. It is unknown how many other subordinates, enlisted and/or officers LTC Takai has solicited for political contributions besides CPT White.**
 - g. **Supporting Fact #7 – LTC Takai was aware that CPT White was not only a reservist but also a Department of the Army (DA) civilian working at Schofield Barracks for the Senior Commander. Evidence of this knowledge is cited by LTC Takai's comment, cited in supporting fact #2, "You can afford it making all that good GS money as 'civilian' (federal)." All acts cited above have a correlation between uniformed service and federal civilians. The U.S. Office of Special Counsel specifies that an individual who is a reservists and a federal civilian employee is covered by the Hatch Act, 5 U.S.C. § 7321 – 7326 and as such cannot be solicited while on duty as civilian. Consider the possibility that LTC Takai could have solicited Mr. White as a civilian on duty at work Mr. White would have been placed in a compromising position jeopardizing CPT White's civilian career with Hatch Act violated which occurred at the behest of a superior officer.**
 - h. **Supporting Fact #8 – CPT White returned home to Hawaii on April 11, 2014. CPT White has not spoken to LTC Takai since their March 25, 2014 conversation. CPT White has NOT and will NOT make any political contributions to LTC Takai's political campaign.**

References:

- a. **Joint Ethics Regulations (JER), DOD Directive 5500.07 (November 17, 2009).**
- b. **Code of Federal Regulations (CFR) Title 5, Part 734**
- c. **2 U.S.C. § 441a**
- d. **10 U.S.C. § 973.**
- e. **DOD Directive 1344.10.**
- f. **Army AR 600-200.**
- g. **18 U.S.C. Chapter 29**
- h. **UCMJ – Article 92**

i. Hatch Act, 5 U.S.C. § 7321 -- 7326

j. US Office of Special Counsel, Hatch Act "FAQs",
<https://www.osc.gov/haFederalfaq.htm>

 Federal Election Commission



Special Notices on Political Ads and Solicitations



FEC Building in downtown Washington, D.C.

FEDERAL ELECTION COMMISSION

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Prepared by the Information Division

Director	Gregory J. Scott
Writer	Katherine E. Carothers
Designer	James Landon Jones

Introduction

This brochure has been developed to help clarify the rules relating to the following types of special notices:

- Disclaimer notices;
- Federal election purpose notification;
- Best efforts notifications; and
- IRS disclosure notices.

Each notice may be required (as appropriate) when persons finance communications related to federal elections or solicit funds for federal political committees.¹ A section-by-section explanation of these rules is provided within.

Please be advised that this brochure is not intended to provide an exhaustive discussion regarding this area of the election law. The citations refer to the Federal Election Campaign Act (FECA), as amended by the Bipartisan Campaign Reform Act of 2002 (BCRA), Federal Election Commission Regulations (11 CFR) and Advisory Opinions (AOs). If you have any questions after reading the brochure, please contact the FEC:

Federal Election Commission
999 E Street, NW
Washington, DC 20463
(202) 694-1100 (local)
(800) 424-9530 (toll free)
(202) 219-3336 (for the hearing impaired)

¹ This brochure serves as the small entity compliance guide to Commission regulations regarding Communications and Solicitations, as required by section 212 of the Small Business Regulatory Enforcement Fairness Act of 1996, Pub. L. No. 104-121, Title II, 110 Stat. 857 (1996).

Disclaimer Notices

What is a Disclaimer Notice?

For the purpose of this brochure, a "disclaimer" notice is defined as a statement placed on a public communication that identifies the person(s) who paid for the communication and, where applicable, the person(s) who authorized the communication.

When is a Disclaimer Required?

Basic Rule

Political Committees

Political committees must include a disclaimer on (1) all "public communications" (defined below), (2) bulk electronic mail (defined as electronic mail with more than 500 substantially similar communications) and (3) websites available to the general public, regardless of whether the communication expressly advocates the election or defeat of a clearly identified candidate, or solicits funds in connection with a federal election (i.e., contributions for a federal candidate or a federal political committee).²

Individuals and Other Persons

A disclaimer must appear on any "electioneering communication" (defined

below) and on any public communication by any person that expressly advocates the election or defeat of a clearly identified candidate or solicits funds in connection with a federal election.

Application

Specific examples of public communications that would require a disclaimer include:

- Public communications coordinated with a federal candidate (i.e., in-kind contributions or coordinated party expenditures) that are paid for by a political committee or that contain express advocacy or a solicitation;
- Independent expenditures;
- Electioneering communications;
- A communication that solicits funds for a federal candidate or a federal political committee or that contains express advocacy; and
- Political committees' websites.

Definitions

Public Communications

As defined in FEC regulations, the term "public communication" includes:

- Broadcast, cable or satellite transmission;
- Newspaper;
- Magazine;
- Outdoor advertising facility (e.g., billboard);
- Mass mailing (defined as more than 500 pieces of mail matter of an identical or substantially similar nature within any 30-day period);
- Telephone banks (defined as more than 500 telephone calls of an identical or substantially similar nature within any 30-day period); or
- Any other general public political advertising. General public political advertising does not include Internet



² The FEC recommends placing disclaimer notices on all campaign materials

ads, except for communications placed for a fee on another person's website (11 CFR 110.11(a)).

Electioneering Communications

As defined in FEC regulations, an "electioneering communication" is a broadcast, cable or satellite communication that fulfills each of the following conditions:

- Refers to a clearly identified federal candidate;
- Is publicly distributed within 30 days before a primary election or within 60 days before a general election; and
- In the case of Congressional candidates only, is "targeted to the relevant electorate" (can be received by 50,000 or more persons in the district or state the candidate seeks to represent) (11 CFR 100.29).

Independent Expenditures

An independent expenditure is an expenditure for a communication that expressly advocates the election or defeat of a clearly identified candidate and is not made in cooperation, consultation or concert with, or at the request or suggestion of, any candidate, authorized committee or their agents, or a political party committee or its agents. 11 CFR 100.16.

Coordinated Party Expenditures

Coordinated party expenditures are expenditures made by national or state party committees on behalf of their nominees in connection with the general election. Such expenditures may be coordinated with the candidate, but are reported only by the party committee

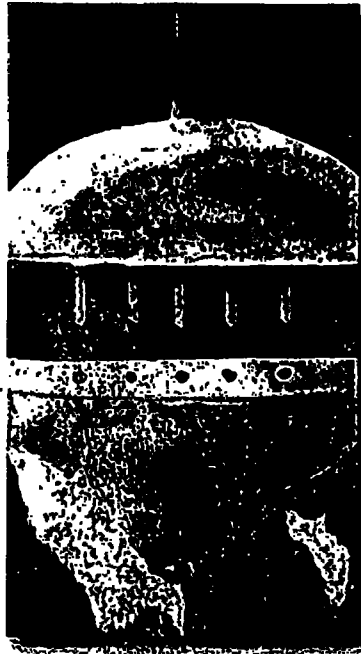
that makes the expenditure. These expenditures are subject to a special monetary limit. 11 CFR 110.11(d)(1).

Exempt Party Activities

State and local party committees may engage in certain candidate-support activities without making a contribution or expenditure provided specific rules are followed. These "exempt" party

activities refer to the three types of communications listed below:

- Registration and get-out-the-vote drives on behalf of the Presidential ticket;
- Campaign materials distributed by volunteers on behalf of federal candidates; and
- Certain state cards, sample ballots and palm cards listing at least 3 candidates for public office (11 CFR 100.80, 100.87 and 100.89; 100.140, 100.147 and 100.149; and 11 CFR 110.11(e)).



What must the Disclaimer Say?

The actual wording of the disclaimer depends on the type of communication, as explained below. In each example, it is presumed that the ad qualifies as a "public communication" in connection with a federal election.

Messages Authorized and Financed by a Candidate

On a public communication that is authorized and paid for by a candidate or his/her campaign committee, the disclaimer notice must identify who paid for the message. 11 CFR 110.11(b)(1).

Example: "Paid for by the Sheridan for Congress Committee."

Messages Authorized but Not Financed by a Candidate

On a public communication that is authorized by a candidate or his/her campaign committee, but is paid for by another person, the disclaimer notice must identify who paid for the communication and indicate that the candidate authorized the message. 11 CFR 110.11(b)(2).

Example: "Paid for by the XYZ State Party Committee and authorized by the Sheridan for Congress Committee."³

Messages Not Authorized by a Candidate

On a public communication that is not authorized by a candidate or his/her campaign committee, the disclaimer notice must identify who paid for the message, state that it was not authorized by any candidate or candidate's committee and list the permanent street address, telephone number or World Wide Web address of the person who paid for the communication. 11 CFR 110.11(b)(3).

Example: "Paid for by the QRS Committee (www.QRScommittee.org) and not authorized by any candidate or candidate's committee."

³ Please note that for communications listing several candidates, the disclaimer notice may state that the message was authorized by the candidates identified in the message or, if only certain candidates have authorized it, by those candidates identified with an asterisk (AO 2004-37).

Coordinated Party Expenditures

Pre-nomination Period

On a public communication that is made as a coordinated party expenditure before a nominee is chosen, the disclaimer notice must identify the committee that paid for the message, but need not state whether the communication was authorized. 11 CFR 110.11(d)(1).

Example: "Paid for by XYZ State Party Committee."



Post-nomination Period

Once a candidate has been nominated for the general election, the disclaimer notice must also state who authorized the communication.

Example: "Paid for by the XYZ State Party Committee and authorized by the Sheridan for Congress Committee."

The committee that actually makes the expenditure is considered to be the person who paid for the public communication even when the committee is acting as the designated agent of a different party committee.

Exempt Party Activities

On exempt activity communications (for example, campaign materials) the disclaimer notice must identify the committee that paid for the message. 11 CFR 110.11(e). Example: "Paid for by the XYZ State Party Committee."

How and Where must the Disclaimer Appear?

In order to give the reader sufficient notice about the person(s) paying for or authorizing a public communication regardless of its medium, the disclaimer notice must be "clear and conspicuous" on the committee's communications, solicitations and response materials. The notice will not be considered to be "clear and conspicuous" if:

- It is difficult to read or hear; or
- The notification is placed where it can be easily overlooked (11 CFR 110.11(c)(1)).

Additional requirements are described below.

Printed Materials

On printed materials, the disclaimer notice must appear within a printed box set apart from the other contents in the communication. The print must be of a sufficient type-size to be clearly readable by the recipient of the communication, and the print must have a reasonable degree of color contrast between the background and the printed statement. 11 CFR 110.11(c)(2)(i), (ii) and (iii).

Example:

Paid for by the Save the
Seahorses Committee and
authorized by the McKay for
Senate Committee.

As long as the disclaimer appears somewhere within the communication it does not have to appear on the front page or cover of multiple-paged documents. However, in the case of single-sided documents and billboards, the disclaimer must appear on the front. 11 CFR 110.11(c)(2)(iv).

Safe Harbor for "Clearly Readable"

The regulations contain a safe harbor that establishes a fixed, 12-point type size as a sufficient type size for disclaimer text in newspapers, magazines, flyers, signs and other printed communications that are no larger than the common poster size of 24 inches by 36 inches. 11 CFR 110.11(c)(2)(i). Please note, disclaimers for larger communications will be judged on a case-by-case basis.

Safe Harbor for "Reasonable Degree of Color Contrast."

The regulations additionally provide two safe harbor examples that would comply with color contrast requirement:

- The disclaimer is printed in black on a white background; or
- The degree of contrast between the background color and the disclaimer text color is at least as great as the degree of contrast between the background color and the color of the largest text in the communication (11 CFR 110.11(c)(2)(iii)).⁴

⁴ These examples do not constitute the only ways to satisfy the color contrast requirement.

Packaged Materials

When communications are distributed in a package or as a group, the distributing entity must evaluate each item separately in order to determine whether a disclaimer notice is required on that item. A message or ad that would require a disclaimer notice if it were distributed separately must still display the notice when it is included in a package of materials. 11 CFR 110.11(c)(2)(v).

Example: A campaign poster is mailed with a campaign brochure and solicitation letter. A disclaimer notice must appear on each of these items.

Radio and Television Communications Authorized by the Candidate

Radio

A radio broadcast must include an audio statement that is spoken by the candidate. The statement must identify the candidate, and state that he or she has approved the communication. 11 CFR 110.11(c)(3)(i).

Television

Like radio broadcasts, televised communications must include an on-disclaimer spoken by the candidate which the candidate identifies him- or

or herself and states that he or she has approved the communication. 11 CFR 110.11(c)(3)(ii).⁵

This disclaimer can be conveyed in one of two ways:

- A full-screen view of the candidate making the statement (11 CFR 110.11(c)(3)(ii)(A)); or
- A "clearly identifiable photographic or similar image of the candidate" that appears during the candidate's voice-over statement (11 CFR 110.11(c)(3)(ii)(B)).

The communication must also include a "clearly readable" written statement that appears at the end of the communication "for a period of at least four seconds" with a "reasonable degree of color contrast" between the background and the disclaimer statement. 11 CFR 110.11(c)(3)(iii).

Radio and Television Messages Not Authorized by the Candidate

Radio

The disclaimer notice must include the name of the political committee or person responsible for the communication and any connected organization.

Example: "ABC is responsible for the content of this advertising." 11 CFR 110.11(c)(4)(i).

Television

The disclaimer described above must be conveyed by a "full-screen view of a representative of the political committee or other person making the statement," or a "voice-over" by the representative. 11 CFR 110.11(c)(4)(i)(ii) and 2 U.S.C. 441d(d)(2).

The disclaimer statement must also appear in writing at the end of the communication in a "clearly readable

⁵ For additional information on broadcast advertising (e.g., radio, TV), please contact the Federal Communications Commission at (202) 418-1440 or (202) 418-7098 (for cable broadcasts).



manner" with a "reasonable degree of color" contrast between the background and the printed statement "for a period of at least four seconds." 11 CFR 110.11(c)(4)(iii).

When is a Disclaimer Not Required?

Although the FEC recommends that disclaimer notices be included on all campaign materials, the notices are not required in the following situations.

Disclaimer Placement is Inconvenient

In situations where a disclaimer notice cannot be conveniently printed, the notice is not required. This provision affects items such as pens, bumper stickers, campaign pins, campaign buttons and similar small items. Further, a disclaimer notice is not required for communications using skywriting, clothing, water towers or other forms of advertisement where it would be impracticable to display the disclaimer notice. 11 CFR 110.11(f)(1)(i) and (ii) (See also AO 2002-9.)

Internal Corporate/Labor Communications

A disclaimer notice is not required for solicitations or communications made by a separate segregated fund or connected organization to its "restricted class." 11 CFR 110.11(f)(2).

Materials Used for Administrative Purposes Only

A disclaimer notice is not required on checks, receipts or similar items of minimal value that do not include a political message and are used only for administrative purposes. 11 CFR 110.11(f)(1)(iii).

⁶ The restricted class includes the executive and administrative personnel of the organization, its stockholders, or its members (noncorporate), and their families. See 11 CFR 114.1(j). See also 11 CFR 114.5(g)(1) and (2); 114.7(a) and (c).

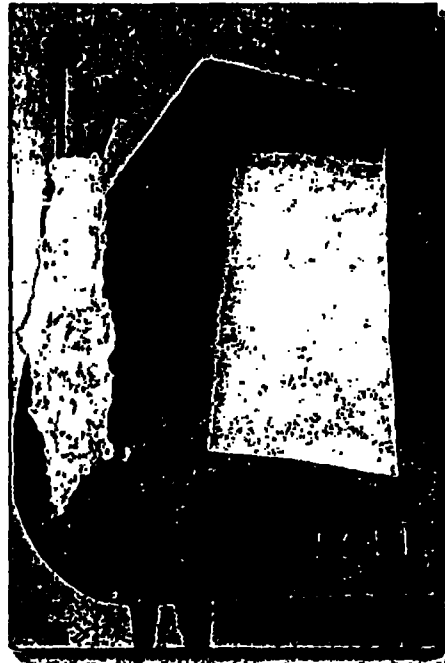
Additional Statements Required in Fundraising Solicitations

Federal Election Purpose Notification

In order to deposit undesignated contributions into its federal account, a federal committee must inform donors that their contributions will be used in connection with federal elections or that they are subject to the limits and prohibitions of the Act. The committee may satisfy this requirement by including that information in its solicitation materials. 11 CFR 102.5(a)(2)(ii) and (iii).

"Best Efforts" Notification

Under the Act and FEC regulations, political committees must report the name, address, occupation and employer of any individual who contributes more than \$200 in a calendar year (or in an election cycle, in the case

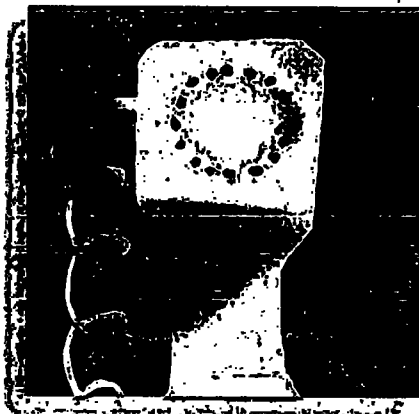


of an authorized committee) (11 CFR 104.3(a)(4)). Committees must make their "best efforts" to obtain and report this information.

To satisfy the "best efforts" requirement, a political committee must include a statement on its solicitations explaining that it is required to make its best efforts to obtain and report contributor information. This statement is referred to as the "best efforts" notification; two examples are listed below:

- Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation, and name of employer of individuals whose contributions exceed \$200 in a calendar year, or
- To comply with Federal law, we must use our best efforts to obtain, maintain, and submit the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 per calendar year.

If the committee does not receive the required contributor information, it must make a follow-up request within 30 days. Any contributor information provided or otherwise available to the committee must be disclosed on FEC reports. In some cases, it may be necessary for the committee to amend previous reports. 11 CFR 104.7.



IRS Disclosure Requirements

Under the Internal Revenue Service Code (26 U.S.C. §6113), certain tax-exempt organizations that are not eligible to receive tax deductible charitable contributions, and whose gross annual receipts normally exceed \$100,000, must disclose in an "express statement (in a conspicuous and easily recognizable format)" that contributions to the organization are not deductible for Federal income tax purposes as charitable contributions. For more information, contact the IRS at (877) 829-5500, (202) 622-7352 or via website at <http://www.irs.gov/charities/political/index.html>.

Safe Harbor for "Format of Disclosure Statement"

Print Medium

In the case of a solicitation by mail, leaflet, or advertisement in a newspaper, magazine or other print medium, the following four requirements are met;

- The solicitation includes whichever of the following statements the organization deems appropriate:
 - » "Contributions or gifts to [name of organization] are not deductible as charitable contributions for Federal income tax purposes,"
 - » "Contributions or gifts to [name of organization] are not tax deductible," or
 - » "Contributions or gifts to [name of organization] are not tax deductible as charitable contributions";
- The statement is in at least the same size type as the primary message stated in the body of the letter, leaflet or ad;
- The statement is included on the message side of any card or tear off section that the contributor returns with the contribution; and
- The statement is either the first sentence in a paragraph or itself constitutes a paragraph.

Telephone

In the case of solicitation by telephone the following three requirements are met:

- The solicitation includes whichever of the following statements the organization deems appropriate:
 - "Contributions or gifts to [name of organization] are not deductible as charitable contributions for Federal income tax purposes,"
 - "Contributions or gifts to [name of organization] are not tax deductible," or
 - "Contributions or gifts to [name of organization] are not tax deductible as charitable contributions".
- The statement is made in close proximity to the request for contributions, during the same telephone call, by the telephone solicitor; and
- Any written confirmation or billing sent to a person pledging to contribute during the telephone solicitation complies with the requirements under Print Medium Solicitations.

Television

In the case of solicitation by television the following two requirements are met:

- The solicitation includes whichever of the following statements the organization deems appropriate:
 - "Contributions or gifts to [name of organization] are not deductible as charitable contributions for Federal income tax purposes,"
 - "Contributions or gifts to [name of organization] are not tax deductible," or
 - "Contributions or gifts to [name of organization] are not tax deductible as charitable contributions".
- If the statement is spoken, it is in close proximity to the request for contributions; if the statement appears on the television screen, it is in large easily readable type appearing on the screen for at least five seconds.



Radio

In the case of a solicitation by radio the following two requirements are met:

- The solicitation includes whichever of the following statements the organization deems appropriate:
 - "Contributions or gifts to [name of organization] are not deductible as charitable contributions for Federal income tax purposes,"
 - "Contributions or gifts to [name of organization] are not tax deductible," or
 - "Contributions or gifts to [name of organization] are not tax deductible as charitable contributions".
- The statement is made in close proximity to the request for contributions during the same radio solicitation announcement.

These safe harbors will remain in effect until further notice from the IRS. Please refer to the IRS either via their website at <http://www.irs.gov/charities/political/index.html> or by phone at (800) 829-3676, (202) 622-7352 for changes to these safe harbors and with any questions you might have pertaining to the safe harbors.



Special Notices on Political Ads and Solicitations
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